

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

YASEIN ALI ABBAS,)
)
 Plaintiff,)
)
 v.)
)
 MICHAEL CHERTOFF, Secretary of) No. 07 C 6167
 Homeland Security; RUTH DOROCHOFF,)
 Director of the Bureau of Citizenship and)
 Immigration Services, Department of) Judge Kennelly
 Homeland Security; ROBERT S.)
 MUELLER II, Director of the Federal)
 Bureau of Investigation,)
)
 Defendants.)

**DEFENDANTS' UNOPPOSED MOTION TO
EXTEND DEADLINE TO FILE ANSWER OR RESPONSIVE MOTION**

Defendants, by their attorney, Patrick J. Fitzgerald, United States Attorney for the Northern District of Illinois, move to extend time to answer or file a motion responsive to the complaint from February 5, 2008, to April 5, 2008. In support of this motion, the defendants state as follows:

1. This is a petition for writ of mandamus under 28 U.S.C. § 1361 to order immediate adjudication of plaintiff Yasein Ali Abbas' Naturalization Application.
2. Defendants' answer or responsive motion was originally due on January 5, 2008.
3. Without opposition from plaintiff Yasein Ali Abbas, defendants requested, and were granted, a one-month extension of their date to answer the complaint, to February 5, 2008.
4. Again without opposition from plaintiff Yasein Ali Abbas, defendants are requesting a second extension of their date to answer or otherwise respond to the complaint.

5. Defendants are making this request because the United States was informed that plaintiff Yasein Ali Abbas' FBI name-check cleared on January 2, 2008. On January 24, 2008, plaintiff Yasein Ali Abbas was scheduled for an updated citizenship interview. For reasons that are unclear, plaintiff did not receive notice of his interview date and consequently failed to attend the scheduled interview. Because the FBI name-check has cleared, the parties are hopeful that the interview can be rescheduled shortly and that this matter can be resolved without further adjudication within the next two months.

6. To that end, defendants are requesting an additional two months to respond to the complaint, to April 5, 2008.

7. Plaintiff Yasein Ali Abbas does not oppose this motion for an extension of time.
WHEREFORE, the defendants request a two-month extension of time to respond to the complaint, to and including April 5, 2008.

Respectfully submitted,

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